

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

I, Lori Robinson, having been duly sworn, hereby depose and state:

**AGENT BACKGROUND**

1. I am a Special Agent with United States Immigration and Customs Enforcement Homeland Security Investigations (“HSI”) and have been so employed since 2014. I am currently assigned to the Manchester, New Hampshire field office. I am authorized to investigate crimes involving violations of Title 18, Title 8, Title 19, and Title 21 of the United States Code (USC). As part of my regular duties as an agent, I investigate criminal violations relating to a broad range of immigration and customs related statutes, including those relating to child exploitation, child pornography, and human trafficking. I have received training in the area of child pornography and child exploitation. I have assisted investigations and executed search warrants involving child exploitation and child pornography offenses, including search warrants of electronic devices. I have received training relating to the trafficking in persons, including sex trafficking, and other offenses.

2. I have participated in investigations of human trafficking, human smuggling, alien harboring, border violations, drug and firearm trafficking, and related offenses. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other federal, state, and local law enforcement agencies. I have debriefed, and continue to debrief, defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes occurring in New Hampshire, nationally, and abroad.

3. From my training and experience, I know that individuals are trafficked for several purposes. Some forms of human trafficking involve involuntary servitude, peonage, debt bondage

and slavery. Victims are often trafficked by force, fraud, and/or coercion. I am familiar with the federal laws regarding human trafficking, including 18 U.S.C. §§ 1591 and 1594 (Sex Trafficking).

4. This affidavit is submitted in support of a criminal complaint charging Arthur Picanco with Attempted Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1), b(2) and 1594(a).

5. As described below, there is probable cause to believe that, on November 14, 2024, in and around Manchester, in the District of New Hampshire, Picanco did knowingly attempt to, in and affecting interstate and foreign commerce, entice, obtain, solicit, and patronize by any means a person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

6. This affidavit is based on my personal investigation and investigation by others, including federal and state law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by interviewing witnesses and examining data obtained in the course of the investigation as well as through other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

### **FACTUAL BACKGROUND**

7. Beginning on or about November 14, 2024, law enforcement agents posted an advertisement (the “Advertisement”) on a website commonly used to advertise commercial sex acts.<sup>1</sup> The Advertisement contained images of what appeared to be two young females and the following language:

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<sup>1</sup> Based on my training and experience, I know that the Internet is global network of computers, which is a means and facility of interstate commerce. I also know that the website on which the Advertisement was posted is viewable outside of New Hampshire.

“Sweet & tight! Ready 2 have some fun!”

“In town 4 a limited time only”

“Cute & very petite girl that is tight from head to toe! Cum over to play with me!”

“Text for donations. Incall only – safe and discrete location.”

8. The Advertisement indicated that the person who would perform commercial sex acts was 99 years old.<sup>2</sup> The Advertisement also contained a contact phone number (the “Advertisement Number”). Law enforcement agents monitored this line and an undercover agent (“UC1”) used it to communicate with potential sex buyers, including Picanco.

9. On or about November 14, 2024, the Advertisement Number received a text message from a phone number ending in 4378 (the “4378 Number”) in response to the Advertisement. Thereafter, a text conversation between UC1 and the user of the 4378 Number ensued. UC1 stated that he/she had two minor girls—ages 12 and 14 years old—available to perform sex acts in exchange for money. The user of the 4378 Number agreed to pay \$100 to have sex with the 14-year-old girl:

PICANCO	Hi
UC1	hello hello
PICANCO	Are you in New Hampshire
UC1	ya hun my girls are in manchester 😊
PICANCO	Your girls? Any in salem nh?
UC1	ya hun theyre my daughters. no sorry
PICANCO	Are you affiliated with any type of law enforcement
UC1	No!!! Are you? im not lookin for any trouble
PICANCO	No, I'm not
PICANCO	So i need more pictures of your girls please
PICANCO	Im not a cop
UC1	what u lookin for?? hr or hh?

<sup>2</sup> The law enforcement agents used a website that is known for containing prostitution advertisements but requires users to be at least 18 years old. Based on my training and experience, I know that this website and others like it have been used by traffickers to advertise the commercial sex acts of children under the age of 18.

UC1	i can send one more pic of each but i dont send more
PICANCO	I was looking for pictures
PICANCO	Ok lets see
UC1	this is my leila shes 14 yo but very experienced
UC1	[Photograph sent] <sup>3</sup>
UC1	this is my sweet izzy shes 12 yo but is learning
UC1	but a really beauty
PICANCO	Do you have any that are legal
UC1	no hun sorry
PICANCO	I need you to say that you are not affiliated with any type of law enforcement
PICANCO	Im not interested. They are too young
PICANCO	[Photograph sent]
PICANCO	Im not a pedophile
PICANCO	Stop doing that to those kids
UC1	its really not a big deal.. its not like i force them plus they love the \$\$
UC1	and im not a cop!!! r u?? i m not lookin for trouble
PICANCO	I think you're a cop.
PICANCO	Text me that you are not affiliated with any type of law enforcement. Say that
UC1	I AM NOT AFFILIATED WITH ANY TYPE OF LAW ENFORCEMENT
PICANCO	What are the rates. Just curious
PICANCO	If you're not a cop then why did you tell me the ages
UC1	if u wanna see one its \$150hh <sup>4</sup> or hr \$300 if ud rather see both its \$400 hr or \$200 hh
UC1	bc theres guys that r not interested n im not giving out our location to just anyone who is not interested
PICANCO	If i go it would be for 100qv <sup>5</sup>
UC1	ya thats fine.. with one girl
PICANCO	You have to call me and tell me you're not a cop
UC1	give me a call if u wanna chat
PICANCO	You call me
UC1	if ur not interested its okay. this isnt for everyone
PICANCO	I said you have to call me

<sup>3</sup> Photographs sent did not depict an actual minor.

<sup>4</sup> I know, based on my training and experience, that “hh” stands for “half hour” and “hr” is an abbreviation for “hour.”

<sup>5</sup> I know, based on my training and experience, that “QV” stands for “quick visit” or a 15-minute visit.

UC1	[Phone call made] <sup>6</sup>
PICANCO	Can i see the face of the other girl
UC1	[Photograph sent]
PICANCO	Shes asian?
UC1	ya her dad is
PICANCO	The other girk is not asian
UC1	diff daddy
PICANCO	I think you're a cop
UC1	idk how many times i have to tell u im not a cop
UC1	how about u just go find something else .. i dont have time for games
PICANCO	Im just nervous. The rest of my life depends on this decision
UC1	u n i... u know i can get my girls taken away right? n i go to jail
UC1	theres plenty of older woman available
PICANCO	What is the address
UC1	which girl u gonna want? were in manchester
PICANCO	Can I pick when I get there
UC1	u want hh or hr??
UC1	also are you clean or u gonna bring condoms??
UC1	what time u wanna come?
PICANCO	We already talked about 100qv for 20 minutes. You dont have condoms? I can leave here now
UC1	i just wanted to make sure u didnt want bare bc thats more \$\$
PICANCO	No i don't
UC1	u know which girl u want? just need to know bc i have another client that wants to come now
PICANCO	It will take me 30 minutes to get there
UC1	okay but u want leila or izzy
UC1	dont want u coming n whichever u want is busy
PICANCO	Whatever one is available
PICANCO	The older one
UC1	u wanna come now? or when?
PICANCO	Now. Like i said, it will take me 30 minutes to get there
PICANCO	I need the address

<sup>6</sup> An undercover officer (“UC2”), posing as the Advertisement Number called Picanco’s number and spoke to him for 3 minutes and 52 seconds. The content of the phone call was similar to the content of the text messages.

10. UC1 then provided Picanco the address of a hotel in Manchester, NH<sup>7</sup> (the “Hotel”). Shortly thereafter, Picanco arrived at the Hotel in a Black Toyota Camry. At the Hotel, there was another undercover agent, UC2, who was posing as the person who posted the Advertisement and the user of the Advertisement Number. Picanco pulled his vehicle up to where UC2 was standing in the parking lot of the Hotel. He rolled down his window and the two had a conversation. Picanco expressed nervousness about the transaction. Picanco confirmed that he wanted to go up to the Hotel room to meet the 14-year-old and that he had the cash to pay for the transaction. UC2 offered Picanco the Hotel room key and confirmed the room number. Picanco accepted the key from UC2.

11. Law enforcement then arrested Picanco and took him into custody. Picanco’s phone was in the vehicle, plugged into the vehicle. Law enforcement officers called the 4378 Number and the phone in the vehicle rang.

### CONCLUSION

12. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging Picanco with attempted sex trafficking of a minor, in violation of Title 18, United States Code, Sections 1591(a)(1), b(2) and 1594 (attempted sex trafficking of a minor).

/s/ Lori Robinson  
Lori Robinson, Special Agent  
Homeland Security Investigations

Attested to by the applicant in accordance  
with the requirements of Fed. R. Crim. P. 4.1  
by phone, on this 15th day of November 2024.

*Andrea K. Johnstone*



HONORABLE ANDREA K. JOHNSTONE  
UNITED STATES MAGISTRATE JUDGE

<sup>7</sup> The hotel is part of a national chain of hotels.